

EXHIBIT 8

Ognjen Milanovic

March 15, 2023

<p style="text-align: right;">Page 1</p> <p style="text-align: center;">IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF OKLAHOMA</p> <p>RANDY LUNDY,)) Plaintiff,) vs.) NO. CIV-22-699-F) HL MOTOR GROUP, INC.,) HIGHLIGHT MOTOR FREIGHT USA,) INC., OLD REPUBLIC INSURANCE) COMPANY, AND) OGNJEN MILANOVIC,)) Defendants.) _____) FARMERS MUTUAL FIRE) INSURANCE COMPANY OF OKARCHE,)) Plaintiff,) vs.) NO. CIV-22-752-F) HL MOTOR GROUP, INC., AND) OGNJEN MILANOVIC,)) Defendants.) _____)</p> <p style="text-align: center;">VIDEOTAPED VIDEOCONFERENCE DEPOSITION OF OGNJEN MILANOVIC LOCATED IN BELGRADE, SERBIA TAKEN ON BEHALF OF THE PLAINTIFFS ON MARCH 15, 2023 REPORTED BY: JANA C. HAZELBAKER, CSR</p>	<p style="text-align: right;">Page 3</p> <p style="text-align: center;">CONTENTS</p> <p style="text-align: right;">Page</p> <p>1</p> <p>2</p> <p>3 Index of Exhibits 4</p> <p>4 Stipulations 5</p> <p>5 Direct Examination by Mr. Pignato 6</p> <p>6 Direct Examination by Mr. Stewart 75</p> <p>7 Reporter's Certificate 127</p> <p>8</p> <p>9 *****</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES</p> <p>2</p> <p>3 (All parties are appearing via videoconference.)</p> <p>4 For the Plaintiff, Gerard F. Pignato</p> <p>5 Farmers Mutual Fire Ryan Whaley</p> <p>6 Insurance Company 400 North Walnut</p> <p>7 of Okarche: Oklahoma City, OK 73104</p> <p>8 (405)239-6040</p> <p>9 jerry@ryanwhaley.com</p> <p>10</p> <p>11 For the Defendants, Michael T. Franz</p> <p>12 HL Motor Group, Lewis Brisbois</p> <p>13 Ognjen Milanovic, Bisgaard & Smith</p> <p>14 and Old Republic 550 West Adams Street</p> <p>15 Insurance Company: Suite 300</p> <p>16 Chicago, IL 60661</p> <p>17 (312)463-3329</p> <p>18 michael.franz@</p> <p>19 lewisbrisbois.com</p> <p>20</p> <p>21 For the Plaintiff, Rodney Stewart</p> <p>22 Randy Lundy: Stewart Law Firm</p> <p>23 801 N.W. 63rd Street</p> <p>24 Suite 100</p> <p>25 Oklahoma City, OK 73116</p> <p>(405)601-6060</p> <p>rstewart@rstewartlaw.com</p> <p>Videographer: Bruce Rodgers</p> <p>Also Present: Joanne Butterworth</p> <p>Legal assistant</p> <p>Gerald Knecht</p>	<p style="text-align: right;">Page 4</p> <p style="text-align: center;">INDEX OF EXHIBITS</p> <p style="text-align: right;">Page</p> <p>1</p> <p>2</p> <p>3 Exhibit Number 1 (Driver logs) 38</p> <p>4 Exhibit Number 2 (Photo, Farmers Mutual 0377) 56</p> <p>5 Exhibit Number 3 (Photo, Farmers Mutual 0374) 57</p> <p>6 Exhibit Number 4 (Photo, Farmers Mutual 0378) 58</p> <p>7 Exhibit Number 5 (Photo, Farmers Mutual 0375) 58</p> <p>8 Exhibit Number 6 (Photo, Farmers Mutual 0376) 59</p> <p>9 Exhibit Number 7 (Photo, Farmers Mutual 0379) 59</p> <p>10 Exhibit Number 8 (Photo, Farmers Mutual 0380) 60</p> <p>11 Exhibit Number 9 (Photo, Farmers Mutual 0382) 60</p> <p>12 Exhibit Number 10 (Photo, Farmers Mutual 0383) 61</p> <p>13 Exhibit Number 11 (Photo, Farmers Mutual 0384) 61</p> <p>14 Exhibit Number 12 (Photo, Farmers Mutual 0385) 61</p> <p>15 Exhibit Number 13 (Google Maps aerial photo) 62</p> <p>16 Exhibit Number 14 (Accident Report, Farmers</p> <p>Mutual 0333 through 0339) 64</p> <p>17</p> <p>18 *****</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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<p style="text-align: right;">Page 109</p> <p>1 A It's -- Woodbridge would be by the border, 2 so I guess heading down south.</p> <p>3 Q So you think this was part of that same 4 journey from Ontario to your des- -- ultimate 5 destination?</p> <p>6 A Yeah, could have been. Sounds like it.</p> <p>7 Q And then the day before the accident, 8 August 7th, it shows you beginning your journey that 9 day at Brights Grove, Ontario, and traveling all the 10 way to Fancy Creek, Illinois, a total of nine hours 11 and 55 minutes of drive time and 509 miles.</p> <p>12 Does that sound right?</p> <p>13 A Sounds like a typical day, yes.</p> <p>14 Q Okay. All right.</p> <p>15 A Yep. Yeah, it sounds like a typical day.</p> <p>16 Q So I'm not sure what's going on with the 17 screen. It looks like maybe the shared screen is 18 off, but there's a big black spot in the middle. Or 19 is that Mr. Milanovic's phone? Is it -- has it gone 20 dark?</p> <p>21 There we go. All right. Thank you.</p> <p>22 Okay. If I were to ask you, sir, what you 23 had to drink in the 48 hours before the collision, do 24 you have any recollection of that?</p> <p>25 A Water or juice, something like that.</p>	<p style="text-align: right;">Page 111</p> <p>1 time in a long while that you had --</p> <p>2 A No.</p> <p>3 Q -- ventured so far south?</p> <p>4 A No. No.</p> <p>5 Q Well, you previously drove for this other 6 company a year or so before you started for the -- 7 the HL Motor Group.</p> <p>8 A Uh-huh.</p> <p>9 Q So had you driven down in this part of 10 the -- part of the world in the summer heat?</p> <p>11 A Yeah, I have, but -- I have, but, you know, 12 you -- being from -- driving, I would say, from 13 Canada, you -- you always notice a difference, 14 obviously. And, you know, older equipment, it -- the 15 air conditioning is never as good as it should be, 16 so, you know, you notice the heat obviously.</p> <p>17 Q Yeah. Do you remember thinking -- and this 18 was your first trip for HL Motor Group. Do you 19 remember thinking that the -- that the air 20 conditioning is not as good as it should be or you 21 would like it to be?</p> <p>22 A Yes, but it's -- with any older equipment, 23 never is that -- what you want it to be.</p> <p>24 Q Right. So -- so you -- would you consider 25 yourself a professional truck driver?</p>
<p style="text-align: right;">Page 110</p> <p>1 Q And I -- I detect in your answer that 2 you're -- you're guessing at that kind of based on 3 your norms?</p> <p>4 A Yeah.</p> <p>5 Q Yeah. So would you be able, for example, 6 to tell us how much water, how much juice, how much 7 Gatorade?</p> <p>8 A No.</p> <p>9 Q Regarding your practices, would -- would it 10 be your practice -- if you -- if you pulled over to 11 get something to drink, would -- would it be your 12 practice to buy, like, I don't know, a case of water, 13 a case of Gatorade, a --</p> <p>14 A Yeah. Yeah. Always. Always. There's 15 some on the side, so, yeah, always. How many depends 16 on the day, you know. I remember that day was pretty 17 hot, so --</p> <p>18 Q Okay. What -- and I predict you are not 19 wrong. August in Oklahoma, August in Joplin, 20 Missouri, I -- I predict it was really hot. But 21 what -- what causes you to remember that it was a 22 really hot day?</p> <p>23 A It's down south and coming back from up 24 north, I would say that -- that it was pretty hot.</p> <p>25 Q Is this the first time -- is this the first</p>	<p style="text-align: right;">Page 112</p> <p>1 A Yeah.</p> <p>2 Q And you understand that you're operating a 3 multi-ton piece of equipment that can cause serious 4 injury, damages and --</p> <p>5 A Yes.</p> <p>6 Q -- you know, death and mayhem, right?</p> <p>7 A Obviously.</p> <p>8 Q And so to the extent that it's hot, you're 9 in older equipment, maybe there's some air 10 conditioning issues, maybe you're not drinking as 11 much as you're supposed to, you understand that it's 12 your job to stay hydrated while you drive?</p> <p>13 A Yes.</p> <p>14 Q And that if it's not safe to drive because 15 you're dehydrated or because your equipment lacks 16 sufficient air conditioning, it's your job to pull 17 over until those situations can be remedied, right?</p> <p>18 A I would agree with you there.</p> <p>19 Q All right. You can't just keep driving if 20 you're dehydrated or hot and tired. You understand 21 that?</p> <p>22 A Yes.</p> <p>23 Q Because if you do, accidents like this can 24 happen. Agree?</p> <p>25 A Agree.</p>

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<p style="text-align: right;">Page 113</p> <p>1 Q All right. So since this accident occurred</p> <p>2 in August of 2020, other than whatever medical</p> <p>3 providers you saw at the hospital immediately</p> <p>4 afterwards, has any physician identified to you what</p> <p>5 caused you to run off the roadway?</p> <p>6 A No.</p> <p>7 Q And I want to stop and talk about that now.</p> <p>8 So -- so in responding to some of Mr. Pignato's</p> <p>9 questions I heard you say different things, and we</p> <p>10 need to pin you down because this is an important</p> <p>11 issue in the case. Okay?</p> <p>12 A Nothing to tell me 100 percent, so --</p> <p>13 Q I -- I understand, but let's do what we can</p> <p>14 here. Okay?</p> <p>15 A Okay.</p> <p>16 Q So you mentioned in -- in one of your</p> <p>17 answers to Mr. Pignato earlier that -- that someone</p> <p>18 at -- I think you said "at the hospital," but I want</p> <p>19 to clarify. I want to be fair to you.</p> <p>20 A Yeah, to the best of my recollection.</p> <p>21 Q Yeah, somebody at the hospital said that</p> <p>22 you could have been fatigued or dehydrated.</p> <p>23 A Yes.</p> <p>24 Q Do you recall saying that?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 115</p> <p>1 A Yes.</p> <p>2 Q You shouldn't keep driving if you're</p> <p>3 fatigued and dehydrated to the point that you lose</p> <p>4 consciousness and run off the roadway, right?</p> <p>5 A Correct.</p> <p>6 Q And if that's what occurred here, you would</p> <p>7 agree the accident would be your fault, and by</p> <p>8 extension, the fault of HL Motor Group. Agree?</p> <p>9 A I wouldn't -- I didn't feel that way so I</p> <p>10 don't know how I can agree with that.</p> <p>11 Q Well, when you say you didn't feel that</p> <p>12 way, you've kind of said some different things here</p> <p>13 today. You've -- you've indicated you don't remember</p> <p>14 that day at all. Okay? You've said that many times</p> <p>15 throughout the deposition.</p> <p>16 You've also said that -- that -- that you</p> <p>17 remember needing to take your break, that you felt</p> <p>18 like you were looking for your next break stop,</p> <p>19 right?</p> <p>20 A Yes, that is -- I remember the -- wanting</p> <p>21 to pick the break.</p> <p>22 Other than that, meaning the day,</p> <p>23 significant parts of it, meaning what happened there,</p> <p>24 that, I do not remember.</p> <p>25 Q Right. So --</p>
<p style="text-align: right;">Page 114</p> <p>1 Q And -- and was that a physician there at</p> <p>2 the OU Medical Center where you were taken?</p> <p>3 A I don't recall who it was. I talked to</p> <p>4 many people and I was groggy, so, yeah, I don't</p> <p>5 remember.</p> <p>6 Q And then you also said, in response to one</p> <p>7 of Mr. Pignato's questions, that -- that someone at</p> <p>8 the hospital may have said you had a sudden loss of</p> <p>9 consciousness, right?</p> <p>10 Now, you would agree with me those are --</p> <p>11 those are two different -- I suppose they could be</p> <p>12 two different things, right?</p> <p>13 A Yes.</p> <p>14 Q If you're fatigued and dehydrated, I</p> <p>15 suppose you could pass out and lose consciousness,</p> <p>16 right?</p> <p>17 A Yes.</p> <p>18 Q But fatigue and dehydration would be</p> <p>19 something within your control. You agree with that?</p> <p>20 A Sure.</p> <p>21 Q All right. If you're feeling dehydrated,</p> <p>22 if you're feeling fatigued, it's time to pull over</p> <p>23 and stop driving. Agree?</p> <p>24 A Uh-huh.</p> <p>25 Q Yes?</p>	<p style="text-align: right;">Page 116</p> <p>1 A The only thing I remember is I was planning</p> <p>2 on stopping at some point.</p> <p>3 Q All right. But --</p> <p>4 A That's the only thing I remember. I don't</p> <p>5 remember being fatigued or thirsty or anything like</p> <p>6 that. I really do not.</p> <p>7 Q Okay. But you also don't remember the</p> <p>8 reverse of that. You don't remember feeling, "Hey,</p> <p>9 I'm not fatigued. I feel great. Life is good, I</p> <p>10 could keep going for another 500 miles." You don't</p> <p>11 remember feeling that, either, right?</p> <p>12 A I have never felt that in my life, no.</p> <p>13 Q Okay. Well, I'm just trying to figure out,</p> <p>14 are -- are you saying you were not feeling fatigued</p> <p>15 or you were not dehydrated, or are you simply saying</p> <p>16 you don't recall feeling either of those things?</p> <p>17 A I don't -- if I had felt that, which I have</p> <p>18 in the past, I would have done something about it,</p> <p>19 but I don't remember feeling that.</p> <p>20 Q And the something you would have done about</p> <p>21 it would be look for a place to pull over and take a</p> <p>22 break, right?</p> <p>23 A Yeah, there's always somewhere close by.</p> <p>24 Q Okay. And, in fact, that's the last thing</p> <p>25 you remember is looking for a place to pull over and</p>

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